

Case Number: 18- CV - 06867

(DLI) (PK)

PROPOSED DISCOVERY PLAN

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	x		4/10/19
2. Rule 26(a)(1) disclosures exchanged	x		4/22/19
3. Requests made:	x		
a. Medical records authorization	x		4/22/19
b. Section 160.50 releases for arrest records		x	
c. Identification of John Doe/Jane Doe defendants		x	
d. Proposed Stipulation of Confidentiality		x	
4. Procedures for producing Electronically Stored Information (ESI) discussed			Conferenced on 4/10/2019.
B. SETTLEMENT			
1. Plaintiff to make settlement demand	x		4/22/19
2. Defendant to make settlement offer			7/17/19
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		x	
4. Settlement Conference (proposed date)			9/18/19
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			7/19/19
2. Initial documents requests and interrogatories			5/22/19
3. All fact discovery to be completed (including disclosure of medical records)			1/17/20
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			1/24/20
5. Expert discovery (only if needed)	Check here if not applicable <input type="checkbox"/>		

Plaintiff expert proposed field of expertise:			
Defendant expert proposed field of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due			3/11/20
b. Rebuttal expert report due			4/15/20
c. Depositions of experts to be completed			6/5/20
6. Completion of ALL DISCOVERY			6/5/20
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			6/12/20
8. If District Judge requires Pre-Motion Conference, date to make request			6/19/20
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule		x	
10. Joint Pre-Trial Order due (if no dispositive motion filed)			7/15/20
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<i>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</i>			
1. Motion for collective action certification in FLSA cases		x	
a. Response due		x	
b. Reply due		x	
2. Motion for Rule 23 class certification		x	
a. Response due		x	
b. Reply due		x	

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
United States Magistrate Judge

Date